



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

ICR/AFM/KCB  
F. #2018R01047

*271 Cadman Plaza East  
Brooklyn, New York 11201*

September 17, 2020

By Email and ECF

James M. Branden  
Albert Y. Dayan  
Kenneth J. Kaplan  
Joel M. Stein  
Geoffrey R. Kaiser  
Todd D. Greenberg  
John S. Wallenstein  
Richard D. Willstatter

Re: United States v. Jack Cabasso, et al.  
Criminal Docket No. 19-CR-582 (DRH)

Dear Counsel:

Enclosed please find the government's supplemental production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The materials produced are subject to the protective order entered in this case on May 29, 2020.

Specifically, enclosed please find Quickbooks Enterprise database files that were seized pursuant to search warrant from Aventura's Quickbooks server (AVENTURA\_0000000515 – 522). Login information for these files will be provided upon request; note that these files can only be accessed with proprietary Quickbooks Enterprise software.

In order to make this information more accessible to defense counsel, the government is also producing two sets of data extracted from the Quickbooks database file Bates numbered AVENTURA\_0000000519. This data includes a Microsoft access database that contains the contents of that Quickbooks database (AVENTURA\_0000000523), as well as standardized reports exported from Quickbooks (AVENTURA\_0000000511 – 514). Further details regarding each file are contained in the table below.

The government renews its request for reciprocal discovery from the defendants.

<b>Records</b>	<b>Bates Number</b>
Quickbooks Report - Sales by Customer	AVENTURA_0000000511
Quickbooks Report - Inventory Valuation	AVENTURA_0000000512
Quickbooks Report - Purchases by Vendor	AVENTURA_0000000513
Quickbooks Report - Purchases by Item	AVENTURA_0000000514
Quickbooks Database - Northport Group Inc.QBW	AVENTURA_0000000515
Quickbooks Database - Northport Group.QBW	AVENTURA_0000000516
Quickbooks Database - NORTHPORT REALTY GROUP LLC.04.12.2019 (Backup Sep 09,2019 07 44 AM).QBB	AVENTURA_0000000517
Quickbooks Database - NORTHPORT REALTY GROUP LLC.QBW	AVENTURA_0000000518
Quickbooks Database - SBU_0_Aventura Technologies2017 - Nov 05,2019 01 00 AM.QBB	AVENTURA_0000000519
Quickbooks Database - Northport Group.QBW.TLG	AVENTURA_0000000520
Quickbooks Database - SBU_0_Northport Group Apr 11,2019 01 00 AM.QBB	AVENTURA_0000000521
Quickbooks Database - SBU_0_Northport Group Apr 12,2019 01 00 AM.QBB	AVENTURA_0000000522
Access Database Containing Data from AVENTURA_0000000519	AVENTURA_0000000523

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

SETH D. DUCHARME  
Acting United States Attorney

By:                     /s/                      
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Enclosures

cc: Clerk of the Court (DRH) (by ECF) (without enclosures)